

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

ORIGINAL

In the Matter of)

)
Amendment of Section 73.202(b),
Table of Allotments,
FM Broadcast Stations
(McCook, Maxwell, and Broken Bow,
Nebraska)

DOCKET FILE COPY ORIGINAL

MB Docket No. 04-203
RM-10976

RECEIVED

To: The Secretary

SEP - 7 2004

Attention: The Chief, Audio Division

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COMMENTS OF MCCOOK RADIO GROUP, LLC

1. McCook Radio Group, LLC ("MRG"), licensee of KRKU(FM), Channel 253C1, McCook, Nebraska, hereby respectfully submits its comments supporting the *Further Notice of Proposed Rule Making*, MB Docket No. 04-203, RM-10976, DA 04-2130, released July 16, 2004 (the "Notice"). MRG respectfully respectfully incorporates by reference its Amendment to Petition for Rulemaking (the "Amended Petition"), filed on January 20, 2004, in this proceeding. MRG also restates its present intention to apply for the operation of KRKU on Channel 253C1 at Maxwell, Nebraska, and, if authorized, promptly construct or modify the station's facilities as contemplated, and affirms that it would reimburse Custer County Broadcasting, Inc. ("Custer") for all reasonable expenses incurred due to the channel change and upgrade of the facilities of KBBN-FM, Broken Bow, Nebraska, as detailed in the Amended Petition.

2. In the Notice, the Commission requested that petitioners state whether there are areas within the current or proposed 60 dBu contour of KRKU where less than five aural reception services are or would be available, and to provide information regarding the number of services available and the area and number of persons served in such areas.¹ As

¹ See Notice, page 2.

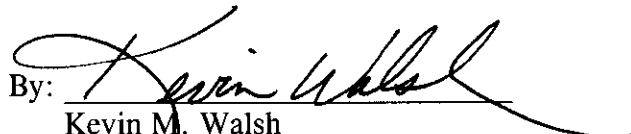
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demonstrated in the engineering statement attached hereto as Exhibit I, there are 14 FM and 14 AM stations with a 1.0 mv/m contour that fall within KRKU's current licensed contour at McCook, and there are 13 FM and 14 AM stations with a 1.0 mv/m contour that fall within KRKU's proposed contour at Maxwell. Therefore, because there are well over five aural reception services within both the current and proposed 60 dBu KRKU contours, no area would be underserved as a result of this reallocation proposal.²

3. WHEREFORE, the premises considered, MRG respectfully requests that the Commission amend the FM Table of Allotments as requested by MRG and Custer.

Respectfully submitted,

MCCOOK RADIO GROUP, LLC

By: 
Kevin M. Walsh
Its Attorney

IRWIN, CAMPBELL & TANNENWALD, P.C.
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Washington, DC 20036
202-728-0400

September 7, 2004

² Because there are no underserved areas, we are not providing the population figures. However, we would be happy to provide those figures upon request.

EXHIBIT I

Engineering Statement

KRKU Coverage Analysis

This study was made to determine the number of additional aural broadcast services inside the 1.0 mv/m or 60 dBu signal contour of the licensed KRKU signal and also a proposed Channel 253C1 operation in Maxwell, Nebraska.

The study found fourteen AM and fourteen FM stations for a total of twenty eight stations with a 1.0 mv/m contour that fell inside the licensed KRKU contour. Five stations provide 1.0 mv/m coverage that completely encompasses the KRKU signal.

KIOD(FM)	Ch. 287C1	McCook, NE
KBRL(AM)	1300 KHz	McCook, NE
KNGN(AM)	1360 KHz	McCook, NE
KRVN(AM)	880 KHz	Lexington, NE
KXXX(AM)	790 KHz	Colby, KS

The attached signal map from the study shows that there are easily more than five additional aural services provided over the entire KRKU licensed 1.0 mv/m contour.

A second study was made of the proposed Channel 253C1 Maxwell, Nebraska. This study used the contour of an average area Class C1 station with 100 kilowatts effective radiated power from a height above average terrain of 150 meters. The study found fourteen AM and thirteen FM stations for a total of twenty seven stations with a 1.0 mv/m contour that would fall inside the Maxwell test contour.

KRVN(AM) 880 KHz Lexington, Nebraska is the only station that completely encompasses the Maxwell test contour. Two North Platte, Nebraska AM stations, KJLT, 970 KHz and KODY, 1240 KHz cover all but the most northern part of the test contour with a 1.0 mv/m signal. The reduction of AM signal coverage to the north is due to the extremely poor ground conductivity in that area. Four North Platte FM stations cover all the test contour with 1.0 mv/m signal, except the far eastern side.

KELN(FM)	Ch. 246C1
KJLT(FM)	Ch. 235C1
KPNE-FM	Ch. 219C1
KXNP(FM)	Ch. 278C1

The east side is covered by the two North Platte AM stations mentioned above and by at least four other stations.

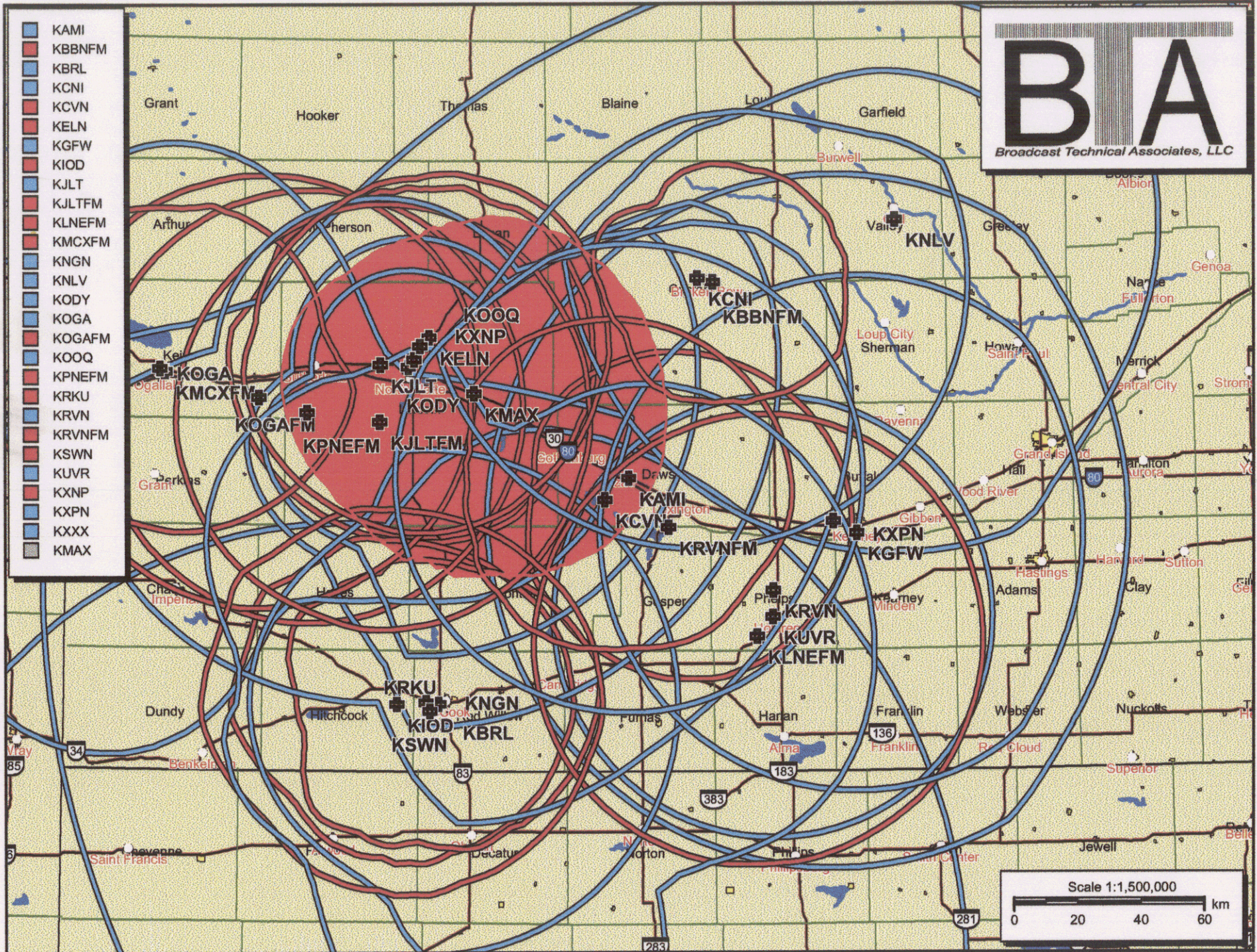
KAMI(AM)	1580 KHz	Cozad, NE
KCVN(FM)	Ch. 285C1	Cozad, NE
KPVN(FM)	Ch. 226C1	Lexington, NE
KXPN(AM)	1460 KHz	Kearney, NE

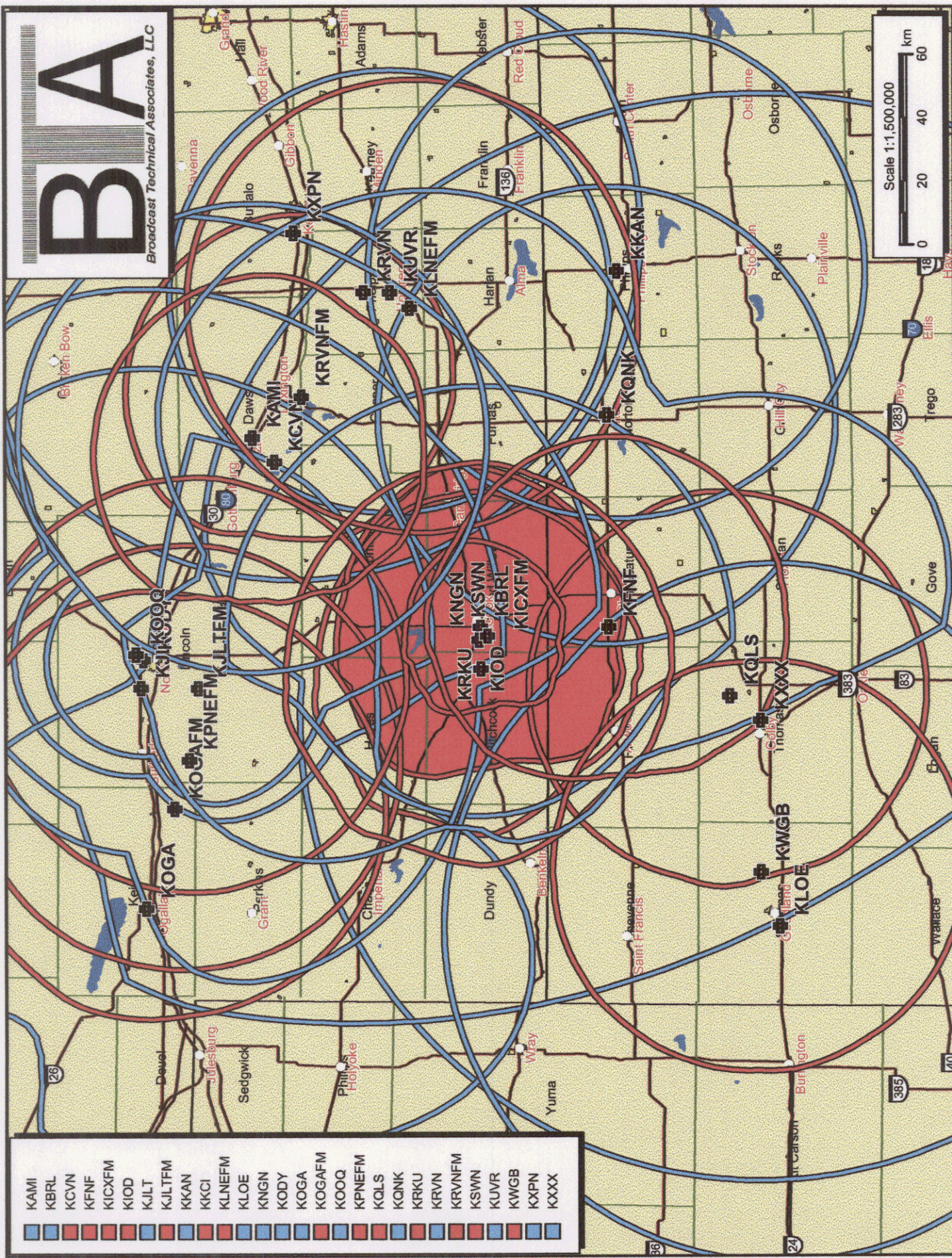
The entire Maxwell, Nebraska test 1.0 mv/m contour is covered by more than 5 other aural services.

The results of this study and the statements made are true and accurate to the best of my knowledge and ability.



Larry P. Waggoner
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| KAMI | KBRL | KCVN | KCNF | KICXFM | KIOD | KJLT | KJLTFM | KKAN | KKCI | KLNEFM | KLOE | KNGN | KODY | KOGA | KOGAFM | KOOQ | KPNEFM | KQLS | KQNK | KRKU | KRVN | KRVNFM | KSWN | KUVR | KWGB | KXPN | KXXX |
|------|------|------|------|--------|------|------|--------|------|------|--------|------|------|------|------|--------|------|--------|------|------|------|------|--------|------|------|------|------|------|


BTA
Broadcast Technical Associates, LLC

Scale 1:1,500,000
0 20 40 60 km

CERTIFICATE OF SERVICE

I, Donna L. Brown, do hereby certify that I have on this 7th day of September 2004, caused to be delivered by First Class, United States Mail, postage prepaid, a copy of the foregoing "Comments of McCook Radio Group" to the following:

Peter Gutmann, Esquire
Womble Carlyle Sandridge & Rice, PLLC
1401 I Street, NW
Seventh Floor
Washington, DC 20005


Donna L. Brown